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December 15, 2022

12/16/2022

**By ECF**

The Hon. Paul A. Crotty  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

The request to join co-defendant's motion is denied. Mr. Laureano should file his own motion and is directed to do so after conferring with the government and co-counsel on a revised briefing schedule. Revised schedule is due by December 21, 2022. SO ORDERED.



***Re: United States v. Laureano, et al.,  
22 Cr. 58 (PAC)***

Dear Judge Crotty:

I, along with Elizabeth E. Macedonio, represent Defendant Carlos Laureano in the above-referenced matter. We are in receipt of Co-Defendant Nnandi Ben-Jochannan's motion, dated, December 15, 2022 (Doc. No 23), to dismiss the indictment based upon the unnecessary delay in bringing the charges before a grand jury, under Rule 48(b) of the Federal Rules of Criminal Procedure, the Due Process Clause of the Fifth Amendment, and the Speedy Trial Clause of the Sixth Amendment. This motion had originally been intended as a joint-motion filed on behalf of both defendants, however, due to a miscommunication between counsel, Mr. Laureano and his overlapping and related analysis were inadvertently excluded.

Accordingly, Mr. Laureano, by and through counsel, hereby respectfully requests permission to join Co-Defendant Nnandi Ben-Jochannan's motion (Doc. No. 23) to the extent applicable to Mr. Laureano (i.e., with respect to Counts 1 and 2 of the Indictment, dated, January 27, 2022 (Doc. No. 1)).<sup>1</sup>

Respectfully submitted,



Michael K. Bachrach  
Elizabeth E. Macedonio  
*Attorneys for Defendant Carlos Laureano*

cc: All parties of record (by ECF)

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<sup>1</sup> Counts 3 and 4 relate to separate conduct inapplicable to the instant motion.